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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 Case #2:18-cv-01371

9 ABOLFAZL HOSSEINPOUR

10 Plaintiff(s),

11 vs.

12 LIBERTY LIFE ASSURANCE
13 COMPANY OF BOSTON, ET AL

14 Defendant(s).

VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL

FILING FEE IS \$250.00

15
16 Iwana Rademackers, Petitioner, respectfully represents to the Court:
(name of petitioner)

- 17
18 1. That Petitioner is an attorney at law and a member of the law firm of
Law Offices of Iwana Rademackers, P.C.

19 (firm name)

20 with offices at 14785 Preston Road, Suite 550
(street address)

21 Dallas
(city)

22 Texas
(state)

75254
(zip code)

23 214-579-9319 iwana@rademackerslaw.com
(area code + telephone number) (Email address)

- 24
25 2. That Petitioner has been retained personally or as a member of the law firm by
26 Liberty Life Assurance Company of Boston to provide legal representation in connection with
[client(s)]
27 the above-entitled case now pending before this Court.
28

3. That since 05/06/1988, Petitioner has been and presently is a
(date)
member in good standing of the bar of the highest Court of the State of Texas
(state)
where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or
from the clerk of the supreme court or highest admitting court of each state, territory, or insular
possession of the United States in which the applicant has been admitted to practice law certifying
the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts of other States on the dates indicated for each, and that Petitioner is presently a member in good standing of the bars of said Courts.

Court	Date Admitted	Bar Number
USDC for the Northern District of Texas	11/07/1988	
USDC for the Eastern District of Texas	05/21/1998	
USDC for the Western District of Texas	09/02/1998	
USDC for the Southern District of Texas	09/11/1998	22781
USDC Eastern/Western Districts of Arkansas	05/22/1998	
USDC for the Western District of Oklahoma	08/13/2013	13-130
See attached for additional courts of admission		

5. That there are or have been no disciplinary proceedings instituted against petitioner, nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory or administrative body, or any resignation or termination in order to avoid disciplinary or disbarment proceedings, except as described in detail below:

NONE

1 6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give
2 particulars if ever denied admission):

3
4 NONE

5
6 7. That Petitioner is a member of good standing in the following Bar Associations.

7
8 Texas

9
10 8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2
11 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
06/12/2018	2:18cv00804	U.S.D.C., District of Nevada	Granted

18
19 (If necessary, please attach a statement of additional applications)

20 9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the
21 State of Nevada with respect to the law of this state governing the conduct of attorneys to the same
22 extent as a member of the State Bar of Nevada.

23 10. Petitioner agrees to comply with the standards of professional conduct required of
24 the members of the bar of this court.

25 11. Petitioner has disclosed in writing to the client that the applicant is not admitted to
26 practice in this jurisdiction and that the client has consented to such representation.

1 That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
2 FOR THE PURPOSES OF THIS CASE ONLY.

3 Iwana Raehle
4 Petitioner's signature

5 STATE OF Texas }
6 COUNTY OF Dallas }

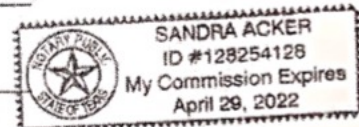
7 Iwana Raehle, Petitioner, being first duly sworn, deposes and says:
8 That the foregoing statements are true.

9 Iwana Raehle
10 Petitioner's signature

11 Subscribed and sworn to before me this

12 15th day of August, 2018

13 Sandra Acker
14 Notary Public or Clerk of Court



15
16 **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO
17 THE BAR OF THIS COURT AND CONSENT THERETO.**

18 Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner
19 believes it to be in the best interests of the client(s) to designate Georlen Spangler,
20 (name of local counsel)
21 Attorney at Law, member of the State of Nevada and previously admitted to practice before the
22 above-entitled Court as associate resident counsel in this action. The address and email address of
23 said designated Nevada counsel is:

24 Law Office of Georlen K. Spangler, 2620 Regatta Drive, Suite 102
25 (street address)

26 Las Vegas, Nevada, 89128
27 (city) (state) (zip code)

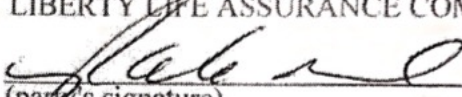
28 702-381-5830, spanglerlaw@outlook.com
(area code + telephone number) (Email address)

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes
2 agreement and authorization for the designated resident admitted counsel to sign stipulations
3 binding on all of us.

4
5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6
7 The undersigned party(ies) appoint(s) Georlen Spangler as
8 his/her/their Designated Resident Nevada Counsel in this case.
(name of local counsel)

9 LIBERTY LIFE ASSURANCE COMPANY OF BOSTON

10 
11 (party's signature)

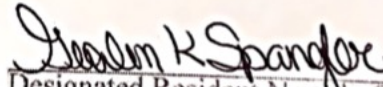
12 By: Paula McGee, Litigation Manager
13 (type or print party name, title)

14 _____
(party's signature)

15 _____
16 (type or print party name, title)

17 **CONSENT OF DESIGNEE**

18 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

19 

20 Designated Resident Nevada Counsel's signature

21 3818

22 Bar number

spanglerlaw@outlook.com

Email address

23 APPROVED:

24 Dated: August 22, 2018.

25 
26 UNITED STATES DISTRICT JUDGE
27
28

Pro Hac Vice Petition, Continuation Sheet

4. Courts Admitted Cont'd

TITLE OF COURT	DATE ADMITTED	BAR NUMBER
U.S.D.C., District of Colorado	01/14/2002	
U.S. Court of Appeals for the Fourth Circuit	09/28/1998	
U.S. Court of Appeals for the Fifth Circuit	08/19/2002	
U.S. Court of Appeals for the Eighth Circuit	01/25/2000	
U.S. Court of Appeals for the Ninth Circuit	08/27/2014	
U.S. Court of Appeals for the Tenth Circuit	07/29/2002	
U.S. Court of Appeals for the Eleventh Circuit	02/06/2012	

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

August 20, 2018

Re: Ms. Iwana Rademaekers, State Bar Number 16452560

To Whom It May Concern:

This is to certify that Ms. Iwana Rademaekers was licensed to practice law in Texas on May 06, 1988, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

This certification expires 30 days from the date, unless sooner revoked or rendered invalid by operation of rule or law.

Sincerely,

Linda A. Acevedo
Chief Disciplinary Counsel
LA/web

